

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Terrell Montay Long

Case No. 1:23-mj-30138
Judge: Morris, Patricia T.
Filed: 04-04-2023

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 2, 2021 in the county of Saginaw in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. §841(a)(1)

Distribution of a controlled Substance

This criminal complaint is based on these facts:

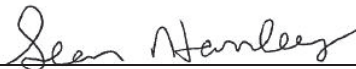
See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: April 4, 2023

City and state: Bay City, Michigan


Complainant's signature

Sean Hanley, Task Force Officer FBI
Printed name and title


Judge's signature

Hon. Patricia T. Morris, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, SEAN HANLEY, having been duly sworn, state as follows:

1. I am a Task Force Officer with the Federal Bureau of Investigation and have been so since 2021. I am currently assigned to the Mid-Michigan Safe Streets Task Force (MMSSTF) and charged with investigating gangs and narcotics trafficking. I have been a Law Enforcement Officer since February 2015.

2. This affidavit is being submitted in support of a criminal complaint alleging that TERRELL MONTAY LONG has violated 21 U.S.C. § 841(a)(1), “Distribution of a Controlled Substance”.

3. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging LONG with the above listed violation, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe the defendant committed the offense alleged in the complaint.

4. On November 2, 2021 LONG was under investigation of the Mid-Michigan Safe Streets Task Force (MMSSTF). A controlled narcotics purchase took place on the same day, utilizing FBI 2. On November 1, 2021, FBI 2 was in texting communication with LONG where FBI 2 ordered a predetermined amount

of heroin and crack cocaine from LONG. On November 2, 2021, FBI 2 placed a recorded phone call into LONG confirming LONG had the pre-ordered narcotics and FBI 2 informed LONG they were on their way. FBI 2 was surveilled directly from a predetermined meet location to LONG's residence in Saginaw at that time. Upon FBI 2's arrival at LONG's Saginaw residence, LONG was seen exiting his residence and getting into FBI 2's vehicle. LONG and FBI 2 have a short conversation inside FBI 2's vehicle and then LONG exited FBI 2's vehicle. A short time later, LONG is seen entering FBI 2's vehicle again. LONG provides FBI 2 with the heroin and FBI 2 provides LONG with a predetermined amount of money to pay for the heroin. LONG then exits FBI 2's vehicle and FBI 2 leaves LONG's residence. FBI 2 is then surveilled directly from LONG's residence back to the predetermined meet location. FBI 2 meet with TFO's and Agent's and confirmed they purchased the heroin from LONG.

5. The heroin purchased from LONG on November 2, 2021, was sent to the Michigan State Police Forensic Science Laboratory located in Bridgeport, MI on November 4, 2021, requesting forensic analysis of the purchased heroin. On December 8, 2021, I received the completed laboratory report. The purchased heroin was identified as Fentanyl.


6. LONG has been previously convicted of three felonies:

- 2009: 10th Circuit Court, Saginaw for Weapons-carry concealed

- 2011: 10th Circuit Court, Saginaw for Weapons-felony firearm,
Weapons-firearms-possession by felon, Weapons-felony firearm, and
Controlled Substance-possession. (Cocaine, heroin, or another narcotic)
less than 25 grams.

-2018: 10th Circuit Court, Saginaw for Controlled Substance-possession
(cocaine, heroin, or another narcotic) less than 25 grams.

7. Based on my training, experience, and information provided in this
affidavit, I believe that TERRELL LONG has violated Title 21 U.S.C. § 841(a)(1).



Sean Hanley
Task Force Officer, FBI

Subscribed and sworn to
before me and/or by reliable electronic means on this 4th day of April 2023.



HONORABLE PATRICIA T. MORRIS
United States Magistrate Judge